

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AGE RE SYSTEMS, INC., CYTEC INDUSTRIES INC., FORD MOTOR COMPANY, SPS TECHNOLOGIES, LLC and TI GROUP AUTOMOTIVE SYSTEMS L.L.C.,	:	Civil Action No. 02-CV-3830 (LDD)
Plaintiffs,	:	
v.	:	
ADVANCED ENVIRONMENTAL TECHNOLOGY CORPORATION, et al.,	:	
Defendants.	:	

**STIPULATIONS BY AND BETWEEN THE PARTIES AS TO THE ADMISSIBILITY
OF CERTAIN EXHIBITS**

1. The parties stipulate that the following documents are moved into evidence without objection by any party, subject to the Court's approval:

See Exhibit A "Plaintiffs' and Defendants' Joint Exhibit List"

2. The parties stipulate that the following documents may be moved into evidence by any party without objection, subject to the Court's approval:

See Exhibit B "Exhibits Which May Be Moved Into Evidence by any Party Without Objection"

Dated: June 18, 2008

Respectfully submitted,

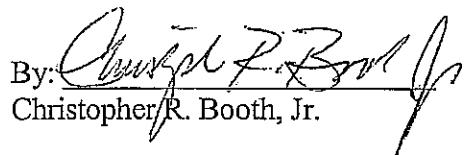
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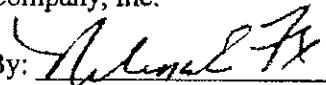
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EXHIBIT A

PLAINTIFFS' AND DEFENDANTS' JOINT EXHIBIT LIST

Trial Exhibit #	Deposition Exhibit #	Bates Ranges	Description of Document
J-1	P-5	BSAI047227- BSAI047229	Boarhead Corporation Certificate of Incorporation, dated September 2, 1969
J-2	P-6	BSAI000428- BSAI000431	Deed Between Robert and Ruth Buckman and Boarhead Corporation, dated October 16, 1969
J-3	P-7	BSAI047242- BSAI047244	DeRewal Chemical Company, Inc. Certificate of Incorporation, dated December 29, 1969
J-4	P-20	PHKS003410- PHKS003414	Lease Agreement Between Philadelphia Hide Corporation and Manfred DeRewal for 3013-31 East Ontario Street, dated November 15, 1973
J-5	P-27	BSAI047236- BSAI047238	Environmental Chemical Control, Inc. Certificate of Incorporation, dated October 18, 1976
J-6		BSAI103743- BSAI1103955	Consent Decree, filed September 28, 2000
J-7		BSAI052839- BSAI052939	Consent Decree, filed March 14, 2002
J-8		BSAI052730- BSAI052825	Administrative Order on Consent for Remedial Design, EPA Docket No. III-2000-002-DC
J-9		BSAI052826- BSAI052939	Administrative Order on Consent for Remedial Design, EPA Docket No. III-2001-001DC
J-10		BSAI104057- BSAI104069	de maximis, inc. Cost Tracking Chart for Operable Unit One RD/RA/O&M Activities (1999-2004)
J-11		BSAI104070- BSAI104073	de maximis, inc. Cost Tracking Chart for Operable Unit One RD/RA/O&M Activities (2005)

Trial Exhibit #	Deposition Exhibit #	Bates Ranges	Description of Document
J-12		BSAI103956- BSAI103957	de maximis, inc. Cost Tracking Chart for Operable Unit 1 RD/RA/O&M Activities (2006)
J-13		BSAI103958- BSAI103359	de maximis, inc. Cost Tracking Chart for Operable Unit 1 RD/RA/O&M Activities (2007)
J-14		BSAI104074- BSAI104078	de maximis, inc. Cost Tracking Chart for Operable Unit Two RD/RA/O&M Activities (2001-2004)
J-15		BSAI104079- BSAI104080	de maximis, inc. Cost Tracking Chart for Operable Unit Two RD/RA/O&M Activities (2005-2006)
J-16			Chart Reflecting Payments Into OU-1 and OU-2 Group Accounts by Plaintiffs, NRM and Worthington
J-17			Charts Reflecting Payments Out of OU-1 and OU-2 Group Accounts to Vendors
J-18		BSAI082008- BSAI082318	USEPA 2000 Past Cost Report
J-19			Site Map (Unmarked)
J-20		BSAI104039- BSAI104042	USEPA Preliminary Close Out Report, dated 11/10/03
J-21			Federal Register 23978, Vol. 53, No. 122, June 24, 1988
J-22			Federal Register 13296, Vol. 54, No. 61, March 31, 1989
J-23		AR314510- AR314532	USEPA Superfund Program Proposed Plan - Boarhead Farms Site, dated January 1998
J-24		AR100036- AR100172	NUS Corporation, 8/22/85, Preliminary Assessment of Boarhead Farms
J-25		AR100173-	NUS Corporation, 1/20/86 Site Inspection of Boarhead

Trial Exhibit #	Deposition Exhibit #	Bates Ranges	Description of Document
J-26		AR100256	Farms
J-27			USEPA Superfund Program Record of Decision, dated November 1998
J-28		PHKS000019- PHKS000245 (also AR000013- AR400239)	USEPA Federal On-Scene Coordinator's Report for Boarhead Farms NPL Site
J-29		BSAII03191- BSAII103264	USEPA Five-Year Review Report, dated 8/22/07
J-30			January 1997 Final Remedial Investigation Report (including Appendices A-I)
J-31			July 1997 Feasibility Study Report
		BSAII102980- BSAII102993	Settlement Agreement by and between Certain Plaintiff Settling Parties and Agere Systems, Inc., dated 3/30/07

EXHIBIT B

EXHIBITS WHICH MAY BE MOVED INTO EVIDENCE BY ANY PARTY WITHOUT OBJECTION

Trial Exhibit #	Deposition Exhibit #	Offered By	Bates Ranges	Description of Document
P-4		Plaintiffs	BSAI015601	Pennsylvania State Police Investigation Report, dated April 26, 1972
P-5		Plaintiffs	BSAI013090-013902 and BSAI015633-BSAI015635	March 7, 1973 and March 12, 1973 BDOH Memorandum
P-6	P-22	Plaintiffs		Waste Discharge Inspection Report and Site Map dated February 14, 1973
P-7	P-23	Plaintiffs		Waste Discharge Inspection Report dated March 5, 1973
P-8	P-24	Plaintiffs	BSAI047230-BSAI047234	Agreement Between Boarhead Corporation and Manfried DeRewal, dated March 21, 1973
P-9		Plaintiffs	BSAI015760-BSAI015761	December 20, 1973 Bucks County Department of Health Memorandum
P-10		Plaintiffs	BSAI013111-BSAI013113 and BSAI013115-BSAI013118	PADER November 2, 1973 Order to Boarhead Corporation
P-11		Plaintiffs	BSAI015676-BSAI015684	Waste Discharge Inspection Report, dated November 5, 1973
P-12		Plaintiffs	BSAI015705-BSAI015710	Waste Discharge Inspection Report, dated November 23, 1973
P-13		Plaintiffs	BSAI015775-	Department of Health Memorandum, dated January 8,

Trial Exhibit #	Deposition Exhibit #	Offered By	Dates Ranges	Description of Document
P-14		Plaintiffs	BSAI015777	1974
P-15		Plaintiffs	BSAI015392- BSAI015393	Department of Health Memo, dated June 28, 1974
P-18	P-25	Plaintiffs	PHKS003282- PHKS003284	Complaint in Equity filed on May 31, 1974 in the Court of Common Pleas of Bucks County with an Injunction Issuing on June 21, 1974 and BSAI013208/BSAI1015828. Agreed Order.
P-19		Plaintiffs	BSAI013271- BSAI013272	Letter and Diagram from Thomas J. Kulesza of the City of Philadelphia Water Department to Manfred DeRewal, dated September 24, 1974 regarding operations at 3015 E. Ontario Street
P-20		Plaintiffs	BSAI013186	June 17, 1975 Philadelphia Water Department Letter
P-21		Plaintiffs	BSAI015828- BSAI015836 and BSAI013208- BSAI013211	Waste Discharge Inspection Report, dated April 25, 1974
P-22		Plaintiffs	BSAI015935	Commonwealth of Pennsylvania Complaint in Equity on May 28, 1974 which was resolved with an agreed order
P-23		Plaintiffs	BSAI018271- BSAI018363	Waste Discharge Inspection Report, dated February 26, 1975
P-25		Plaintiffs	BSAI015953-	Bench Opinion filed May 16, 1978 in United States v. Manfred DeRewal, et al. in the United States District Court for the Eastern District of Pennsylvania at Docket No. 77-287
				Waste Discharge Inspection Report, dated July 16,

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P-27		Plaintiffs	BSAI015954	1975
P-30		Plaintiffs	BSAI016037- BSAI016043	Waste Discharge Inspection Report, dated April 1, 1976
P-31		Plaintiffs	BSAI016117	BCDOH "Field Action Report", dated July 9, 1976
P-32	D-4	Plaintiffs	BSAI016124	Waste Discharge Inspection Report, dated July 30, 1976
P-48	Jonas-14	Plaintiffs	NOV 0188- NOV 0191	Bridgeton Police Department complaint of ammonia odor on September 8, 1976
P-139	Jonas-14	Plaintiffs		February 18, 1975 Letter from Phyllis Jonas to NJDEP (identified during the 6/21/95 deposition of Marvin Jonas in the Buzby landfill litigation)
P-140	Jonas-15	Plaintiffs		Marvin Jonas, Inc. Registration Statement for solid/liquid waste collector-hauler dated March 31, 1975 (identified during the 6/21/95 deposition of Marvin Jonas in the Buzby landfill litigation)
P-141	Jonas-11	Plaintiffs		Marvin Jonas, Inc. Registration Statement for a solid/liquid waste collector-hauler dated May 26, 1977 (identified during the June 21, 1995 deposition of Marvin Jonas in the Buzby landfill litigation)
P-143		Plaintiffs	SPST00137- SPST00155;	SPS Purchase Orders, DCC Shipping Orders and DCC Invoices
P-144		Plaintiffs	SPST00165- SPST00176; SPST00234	DCC Invoices and Ford Purchase Orders
			FORD00009; FORD00010-	

Trial Exhibit #	Deposition Exhibit #	Offered By	Bates Ranges	Description of Document
			FORD00012; FORD00016; FORD00032- FORD000121; FORD000128; FORD000130- FORD000132 FORD000134	Jonas Registration Statements (1972-1978)
P-173	Jonas-10 Jonas-11 Jonas-12 Jonas-15 Jonas-20	Plaintiffs		6/6/01 Letter from Geoffrey Seibel of de maximis to James Harper of USEPA re Proposal to Modify Groundwater Extraction System and Request to Extend RD/RA Schedule (Note: This version is incomplete - a complete non- Bates labeled version is also attached)
P-188		Plaintiffs	BSAI037216- BSAI037219	Affidavit of George Smajda (including attachments)
P-279		Plaintiffs		